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Mr. Vernon A. Williams, Secretary
Surface Transportation Board
Case Control Unit
1925 K Street N.W.
Washington, DC 20423-0001
USA

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Dear Mr. Williams,

Re: CN - BNSF Railways - STB Ex Parte No. 582

Doman Forest Products Ltd. is a fully integrated forest company with an annual production of over 1 billion board feet of lumber and 400,000 metric tonnes of pulp. We are a major user of rail service in the U.S. and Canada. The purpose of this letter is to comment on the issues to be discussed on March 8, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF merger is good for shippers, not on potential downstream effects. The CN-BNSF combination should be judged on its own merits. If other carriers propose mergers, then these cases should be evaluated on their merits.

The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. Recent mergers have failed on service, not as a result of timing. Accordingly, we would suggest that the Surface Transportation Board should focus on ensuring that the CN-BNSF combination, and any other future mergers, will deliver service.

Your office has a comprehensive process to evaluate railroad transactions and protect the public interest. We believe it should fairly evaluate the CN-BNSF merger according to that process. We are hopeful that the Surface Transportation Board will not let other railroads use this process to protect themselves and not shippers.

Yours truly,

Rick Doman
Manager, N.A. Sales